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July 31, 2023

Hon. Barbara C. Moses, U.S.M.J.
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007
VIA ECF

**Re: Leitch et al. v. Amazon Services Com LLC
SDNY Docket No.: 22-cv-06121- BCM**

Dear Judge Moses,

I represent Plaintiffs in this matter. I am submitting this letter on behalf of all parties seeking an extension of time for the parties to file a proposed discovery plan by Monday, August 7, 2023. This is the first request of this type and there is no prejudice to any party.

The parties were directed by Your Honor's chambers in a telephone conference to file a letter describing the state of discovery and a proposed discovery plan. While no particular date was given, two weeks have elapsed since that telephone conference.

The parties had a meet and confer session last week during which they discussed the status of the discovery and the possibility of streamlining the discovery issues awaiting Your Honor's ruling by among others, possibly allowing the parties' experts to have a direct conference with a view to resolving the issue of electronic time and productivity records. Counsel need the additional time to consult with their clients and have a follow up discussion. We believe that we should be ready to file the letter in question within this week.

Wherefore, the parties respectfully request that Your Honor permit them to file a proposed discovery plan by Monday, August 7, 2023.

Respectfully submitted,

/s/ Robert Wisniewski
Robert Wisniewski

cc: All counsel of record via ECF

Application GRANTED. No later than **August 7, 2023**, the parties shall file (i) their proposed revised discovery plan, and (ii) a letter updating the Court on the status of the specific discovery issues that are the subject of plaintiffs' June 27, 2023 letter (Dkt. 90), and whether the parties still require the Court's assistance to resolve any of those issues. SO ORDERED.



Barbara Moses, U.S.M.J.
August 1, 2023